

# Exhibit 1

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

Grace C. Brier  
To Call Writer Directly:  
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December 29, 2023

**BY EMAIL**

Michael E. Nemelka  
Kellogg, Hansen, Todd, Figel & Frederick  
P.L.L.C.  
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Washington, D.C. 20036-3215

Peggy J. Wedgworth  
Milberg Tadler Phillips Grossman LLP  
One Pennsylvania Plaza  
New York, NY 10119

Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3128268 through CDK-3129266. This production includes Dealer contract documents that were not previously produced by Dealers. The production also includes certain additional data that our expert may rely on in connection with class analyses, pursuant to Fed. R. Civ. P. 26(e). The below chart aligns the original data source with the new data produced today.

Data	New Bates Number	Original File(s)
CDK Loss Data	CDK-3128713	CDK-3116418
CDK Wins Data	CDK-3128714	CDK-3116420 CDK-3123777

The production is provided by FTP in the email transmitting this letter, and an encryption password will follow separately. Documents in this production have been designated “Highly Confidential” in accordance with the Second Amended Agreed Confidentiality Order in this proceeding (Dkt. 650), and should be treated accordingly. This production is made subject to and without waiver of any of CDK’s existing or potential objections to discovery requests, including

**KIRKLAND & ELLIS LLP**

Michael E. Nemelka  
Peggy J. Wedgworth  
December 29, 2023  
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that the document in the production are not relevant to any claim. In addition, by providing these documents, CDK does not intend to waive, and is not waiving, its protections under the attorney-client privilege, the work product doctrine, or any other applicable privilege. Any disclosure of privileged or protected information is inadvertent and should not be deemed a waiver. In accordance with the Agreed Confidentiality Order, CDK requests that counsel promptly return or destroy any inadvertently disclosed privileged documents and all copies thereof.

Please let me know if you have any difficulty accessing the documents.

Sincerely,

*/s/ Grace C. Brier*

Grace C. Brier

CC: MDL Counsel of Record

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January 8, 2024

**BY EMAIL**

Michael E. Nemelka  
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Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3129333 through CDK-3129696. This production includes Dealer contract documents that were not previously produced by Dealers.

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**KIRKLAND & ELLIS LLP**

Michael E. Nemelka  
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January 8, 2024  
Page 2

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Sincerely,

*/s/ Grace C. Brier*

Grace C. Brier

CC: MDL Counsel of Record

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January 13, 2024

**BY EMAIL**

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Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3129697 through CDK-3130449. This production includes Dealer contract documents that were not previously produced by Dealers.

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January 13, 2024  
Page 2

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Sincerely,

*/s/ Grace C. Brier*

Grace C. Brier

CC: MDL Counsel of Record

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January 20, 2024

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Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3130450 through CDK-3130983. This production includes Dealer contract documents that were not previously produced by Dealers.

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January 20, 2024  
Page 2

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Sincerely,

*/s/ Grace C. Brier*

Grace C. Brier

CC: MDL Counsel of Record

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February 1, 2024

**BY EMAIL**

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Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3131326 through CDK-3131518. This production includes Dealer contract documents that were not previously produced by Dealers.

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February 1, 2024  
Page 2

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Sincerely,

*/s/ Grace C. Brier*

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CC: MDL Counsel of Record

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February 18, 2024

**BY EMAIL**

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New York, NY 10119

Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3131519 - CDK-3138460. This production includes various documents that our expert may rely on in connection with class analyses, pursuant to Fed. R. Civ. P. 26(e).

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February 18, 2024  
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Sincerely,

*/s/ Grace C. Brier*

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CC: MDL Counsel of Record

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February 20, 2024

**BY EMAIL**

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Re: *In re Dealer Management System Antitrust Litig.*, MDL 2817 (N.D. Ill.)

Counsel:

This letter accompanies CDK Global, LLC’s (“CDK”) production of documents Bates stamped CDK-3138461 - CDK-3138463. This production includes information that our expert may rely on in connection with class analyses, pursuant to Fed. R. Civ. P. 26(e).

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Michael E. Nemelka  
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February 20, 2024  
Page 2

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Sincerely,

*/s/ Grace C. Brier*

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CC: MDL Counsel of Record